



HON. SYLVIA O. HINDS-RADIX
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THE CITY OF NEW YORK
LAW DEPARTMENT
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October 17, 2023

VIA ECF

Hon. James P. Cronan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

SO ORDERED
Date: October 18, 2023
New York, New York

The request to adjourn the deadlines set by the Court's Order, Dkt. 26, by fourteen days is granted: motions for summary judgment are now due November 6, 2023, oppositions are due on December 6, 2023, and any replies are due on December 20, 2023. The Clerk of Court is respectfully directed to close the motion pending at Dkt. 28.

A handwritten signature in black ink, appearing to read 'John P. Cronan', is written over a horizontal line.

JOHN P. CRONAN
United States District Judge

Re: *S.G. v. N.Y.C. Dep't of Educ.*, 23-cv-4580 (JPC)(VF)

Dear Judge Cronan:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiffs seek attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* ("IDEA"), as well as for this action.

I write, on behalf of all parties, to respectfully request a 14-day adjournment of the current briefing schedule for Plaintiff's fee motion (ECF No. 26) to allow the parties two additional weeks to negotiate settlement. Plaintiffs advised on October 12, 2023 that they will refrain from billing for that motion until October 26, 2023. This is the first request for an adjournment of the briefing schedule. The parties initiated settlement discussions on September 12, 2023 and have continued to negotiate up through today.

Accordingly, Defendant respectfully requests that the briefing schedule be adjourned 14 days, with Plaintiff's motion due November 20, 2023, Opposition due December 20, 2023, Reply, if any, due January 3, 2024, and further proposes that a joint status letter be due by November 16, 2023, either informing the Court that this matter has been resolved, or that the parties intend to proceed to motion practice.

Thank you for considering this request.

Respectfully submitted,

/s/

Lauren Howland
Special Assistant Corporation Counsel

cc: Kate Cassidy, Esq. (via ECF)
Rebecca Shore, Esq. (via ECF)